

# EXHIBIT 1.1

## Notice of Removal

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**RICHMOND VENTURES, INC.**

*Plaintiff,*

**V.**

**THE CITY OF HOUSTON**

*Defendant.*

§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO:** \_\_\_\_\_

**INDEX OF STATE COURT DOCUMENTS**

- A. Court Docket Sheet
- B. Plaintiff's Original Petition
- C. Civil Case Information Sheet
- D. Civil Process Request Form
- E. Citation Served on the Defendant, The City of Houston
- F. Defendant, The City of Houston's Original Answer
- G. Order from the State Court (The Court has set a case Management Conference for 08:30 a.m. on Monday, November 2, 2015.

(DMZWS6)

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Case 201542637-7  Style: RICHMOND VENTURES INC VS. CITY OF HOUSTON Court: 215  
Type: OTHER CIVIL

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<a href="#">67064054</a>	2	CASE FILE	DCA Generic Letter	9/16/2015	<a href="#">Add To Basket</a>

# EXHIBIT A

CAUSE NO. \_\_\_\_\_

RICHMOND VENTURES, INC.	§	IN THE CIVIL DISTRICT COURT
	§	
<i>Plaintiff,</i>	§	
	§	OF HARRIS COUNTY, TEXAS
VS.	§	
	§	
THE CITY OF HOUSTON	§	
	§	
<i>Defendant.</i>		_____ JUDICIAL DISTRICT

**PLAINTIFF’S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, Richmond Ventures, Inc., files this Original Petition against Defendant, the City of Houston.

**I.**

**Parties**

1. Richmond Ventures, Inc. (hereinafter, “Plaintiff”) is a Texas Corporation with its principal place of business in Harris County, Texas. Richmond is the operator of “Legends”, which is a BYOB gentlemen’s club located at 6333 Richmond Avenue in Houston, Texas.

2. Defendant, the City of Houston (hereinafter, the “City”), is a Texas home rule municipal corporation and may be served with process by serving the City Secretary, Anna Russell, at 900 Bagby, City Hall Annex, Houston, Texas 77002.

**II.**

**Jurisdiction and Venue**

3. This court has jurisdiction over the issues in this suit because the Plaintiff seeks damages in excess of the minimum jurisdictional limits of the Court.

**EXHIBIT B**

4. Venue is appropriate in this Court, because the Defendant is located in Harris County, Texas and all events at issue in this lawsuit took place in Harris County, Texas.

### III.

#### Background

5. The City brought suit against certain adult entertainment clubs in Cause No. 2010-19512; *The City of Houston v. A.H.D. Houston, Inc.*; in the 295<sup>th</sup> Judicial District Court of Harris County, Texas for alleged violations of certain City ordinances.

6. The City filed brought another suit against certain clubs in Cause No 2010-19522; *The City of Houston v. ICE Embassy, Inc.*; in the 152<sup>nd</sup> Judicial District Court of Harris County, Texas.

7. The City was a defendant in Cause No. 2012-60353; *Hospitality Executives of Houston, Inc. v. The City of Houston*; in the 269<sup>th</sup> Judicial District Court of Harris County, Texas, where the plaintiffs sought a declaration that certain provisions of Houston's Code of Ordinances related to the regulation of the clubs were unconstitutional.

8. On or about November 27, 2013, sixteen clubs and the City entered into a Settlement Agreement ("Settlement") related to the ongoing legal disputes described above. The Settlement went into effect January 1, 2014.

9. The intended or consequential effect of the Settlement was that the clubs that are part of the Agreement are treated differently by the City than are the clubs who are not part of the Agreement. The disparate treatment is not based upon the actions of a particular club, but rather is solely related to whether the club is part of the Settlement.

10. Clubs in Houston, which are in the same business as the settling clubs, but are not part of the Settlement, including Legends, have been placed at a competitive disadvantage because

they are treated differently than the clubs that are part of the Settlement. Additionally, even if a club asks to become part of the Settlement and makes whatever changes requested by the City to the lay-out of their club, there is no guarantee that they will be allowed to join the settlement.

11. Legends is subject to the anticompetitive and harassing policies of the City. For several years, Plaintiff has attempted to work with the City to ensure that Legends, and all similar businesses, operate properly and within the law. Plaintiff has solicited meetings with the City and has endeavored to make whatever changes the City recommends to its business location and its operations. Plaintiff, however, continues to be harassed and targeted, while the clubs in the settlement are left largely alone.

12. Since the Settlement went into effect, Legends has suffered a significant drop in revenue as increased police harassment of its operations, and a corresponding decrease in the harassment of its competitors (namely, the clubs that are part of the settlement), have driven customers from Legends to other clubs.

#### **IV.**

##### **Causes of Action**

##### **A. Violation of the Sherman Act, 15 U.S.C. § 1**

13. The Sherman Act states that “every contract, combination in the form of trust or otherwise, or conspiracy, in restraint of trade or commerce among the several States or with foreign nations, is hereby declared to be illegal.” 15 U.S.C. § 1.

14. The effect and intent of the Agreement is to allow some clubs to gain a competitive advantage over others.

15. The City’s enforcement of the Agreement, and the City’s exclusion of Legends and other similarly-situated clubs from the Agreement is an unlawful, contractual restraint of trade.

16. By engaging in the unlawful activities described herein, and as a direct and proximate result of the City's actions, Legend's business has been irreparably harmed and damaged, and the harm is continuing in nature.

17. Legends is entitled to recovery of reasonable attorney's fees.

18. Legends seeks a declaration from this Court that the Agreement is anticompetitive in nature and an illegal restraint of trade under 15 U.S.C. § 1.

**B. Violations of the Equal Protection and Due Process clauses of the US Constitution.**

19. The actions of the City as set forth herein is a violation of the Fifth and Fourteenth Amendments to the US Constitution. There is no compelling governmental interest in selectively enforcement ordinances that favor one adult entertainment establishment over another.

**V.**

**PRAYER**

WHEREFORE, Plaintiff prays that the Defendant be cited to appear and after an adjudication on the merits that the Plaintiff receive all such relief, both legal and equitable to which it is justly entitled.

Respectfully submitted,

LAW OFFICES OF KEVIN MICHAEL  
MADDEN, P.L.L.C.

By: /s/ Kevin M. Madden

Kevin Michael Madden  
State Bar No. 24041376  
5225 Katy Freeway Suite 520  
Houston, Texas 77007  
(281) 888-9681 (telephone)  
(832) 538-0937 (facsimile)  
E-mail: [kmm@kmaddenlaw.com](mailto:kmm@kmaddenlaw.com)

ATTORNEY FOR PLAINTIFF



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this August 20, 2015

Certified Document Number: 66336617 Total Pages: 4

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

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(e.g., John Smith v. All American Insurance Co. In re Mary Ann Jones. In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

<b>1. Contact information for person completing case information sheet:</b> Name: <u>Kevin M. Madden</u> Email: <u>kmadden@kmaddenlaw.com</u> Address: <u>5225 Katy Fwy. Ste 520</u> Telephone: <u>281-888-9681</u> City/State/Zip: <u>Houston/TX/77007</u> Fax: <u>832-538-0937</u> Signature: <u>[Signature]</u> State Bar No: <u>24041376</u>		<b>Names of parties in case:</b> Plaintiff(s)/Petitioner(s): <u>Richmond Ventures Inc.</u> Defendant(s)/Respondent(s): <u>The City of Houston</u> [Attach additional page as necessary to list all parties]		<b>Person or entity completing sheet is:</b> <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____					
<b>2. Indicate case type, or identify the most important issue in the case (select only 1):</b>									
<b>Civil</b>			<b>Family Law</b>						
<b>Contract</b> <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: <b>Foreclosure</b> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:		<b>Injury or Damage</b> <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <b>Malpractice</b> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <b>Product Liability</b> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input type="checkbox"/> Other Injury or Damage:		<b>Real Property</b> <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other:		<b>Marriage Relationship</b> <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <b>Divorce</b> <input type="checkbox"/> With Children <input type="checkbox"/> No Children <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other:		<b>Post-judgment Actions (non-Title IV-D)</b> <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child:	
<b>Employment</b> <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment:		<b>Other Civil</b> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input checked="" type="checkbox"/> Other: <u>Constitutional Violations</u>							
<b>Tax</b> <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax		<b>Probate &amp; Mental Health</b> <b>Probate/Wills/Intestate Administration</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other:							
<b>3. Indicate procedure or remedy, if applicable (may select more than 1):</b>									
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover					
<b>4. Indicate damages sought (do not select if it is a family law case):</b>									
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000									

EXHIBIT C



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this August 20, 2015

Certified Document Number: 66336618 Total Pages: 1

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FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Plaintiff's Original Petition

FILE DATE OF MOTION: 7/23/2015  
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: City of Houston

ADDRESS: 900 Bagby, City Hall Annex, Houston, TX 77002

AGENT, (if applicable): Anna Russell

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE  
☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Professional Civil Process Phone: 18009507443  
☐ MAIL ☐ CERTIFIED MAIL  
☐ PUBLICATION:  
Type of Publication: ☐ COURTHOUSE DOOR, or  
☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_  
☐ OTHER, explain \_\_\_\_\_

\*\*\*\*\*

\*\*\*\*

2. NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

AGENT, (if applicable): \_\_\_\_\_

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): \_\_\_\_\_

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE  
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_  
☐ MAIL ☐ CERTIFIED MAIL  
☐ PUBLICATION:  
Type of Publication: ☐ COURTHOUSE DOOR, or  
☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_  
☐ OTHER, explain \_\_\_\_\_

ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:

NAME: Kevin M. Madden TEXAS BAR NO./ID NO. 24041376

MAILING ADDRESS: 5225 Katy Fwy Suite 520 Houston, TX 77007

PHONE NUMBER: 281 888-9681 FAX NUMBER: 832 538-0937  
area code phone number area code fax number

EMAIL ADDRESS: kmm@xmaddenlaw.com



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this August 20, 2015

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DELIVERED THIS 18 DAY OF AUGUST  
BY [Signature]  
PROFESSIONAL CIVIL PROCESS

CAUSE NO. 201542637

DELIVERED THIS \_\_\_\_\_ DAY OF \_\_\_\_\_  
BY \_\_\_\_\_  
PROFESSIONAL CIVIL PROCESS

RECEIPT NO.

\*\*\*\*\*

0.00

CIV

TR # 73152524

PLAINTIFF: RICHMOND VENTURES INC

vs.

DEFENDANT: CITY OF HOUSTON

In The 215th  
Judicial District Court  
of Harris County, Texas  
215TH DISTRICT COURT  
Houston, TX

CITATION

THE STATE OF TEXAS  
County of Harris

TO: CITY OF HOUSTON BY SERVING AGENT ANNA RUSSELL  
CITY HALL ANNEX  
900 BAGBY HOUSTON TX 77002



Attached is a copy of PLAINTIFF'S ORIGINAL PETITION

This instrument was filed on the 23rd day of July, 2015, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 24th day of July, 2015, under my hand and seal of said Court.

Issued at request of:

MADDEN, KEVIN MICHAEL  
5225 KATY FREEWAY, SUITE 520  
HOUSTON, TX 77007  
Tel: (281) 888-9681  
Bar No.: 24041376



Chris Daniel  
CHRIS DANIEL, District Clerk  
Harris County, Texas  
611 Caroline Houston, Texas 77002  
(P.O. Box 4651, Houston, Texas 77210)

GENERATED BY: DENMON, BRIANNA JANE 3B5//10151950

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at \_\_\_\_\_ o'clock \_\_\_\_\_ .M., on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Executed at (address) \_\_\_\_\_ in

\_\_\_\_\_ County at \_\_\_\_\_ o'clock \_\_\_\_\_ .M., on the \_\_\_\_\_ day of \_\_\_\_\_,

\_\_\_\_\_, by delivering to \_\_\_\_\_ defendant, in person, a true copy of this Citation together with the accompanying \_\_\_\_\_ copy(ies) of the \_\_\_\_\_ Petition

attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Fee: \$ \_\_\_\_\_

\_\_\_\_\_ of \_\_\_\_\_ County, Texas

By \_\_\_\_\_  
Deputy

Affiant

On this day, \_\_\_\_\_, known to me to be the person whose signature appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Notary Public



**CAUSE NO. 2015-42637**

<b>RICHMOND VENTURES, INC.</b>	§	<b>IN THE DISTRICT COURT OF</b>
<i>Plaintiff,</i>	§	
	§	
<b>V.</b>	§	<b>HARRIS COUNTY, TEXAS</b>
	§	
<b>THE CITY OF HOUSTON</b>	§	
<i>Defendant.</i>	§	<b>215<sup>th</sup> JUDICIAL DISTRICT</b>

**CITY OF HOUSTON'S ORIGINAL ANSWER TO  
PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, Defendant City of Houston (Houston), and files its Original Answer to Plaintiff's Richmond Ventures, Inc. (Plaintiff) Original Petition and shows the Court the following:

**GENERAL DENIAL**

1. Pursuant to Rule 92 of the *Texas Rules of Civil Procedure*, Houston asserts a general denial of each and every allegation made by Plaintiff and respectfully requests that Plaintiff be required to prove the charges and allegations, if any, against it by a preponderance of the evidence as required under Texas law.

**PRAYER**

For all of these reasons, Defendant City of Houston, Texas, asks that Plaintiff's suit be dismissed on the merits and that Plaintiff takes nothing. Houston further prays for its cost and for such other and further relief to which it may be justly entitled.

Respectfully submitted,

**DONNA L. EDMUNDSON**  
**City Attorney**

**EXHIBIT F**

JUDITH L. RAMSEY  
Chief, General Litigation Section

By: /s/ James M. Corbett  
James M. Corbett  
Sr. Assistant City Attorney  
State Bar No.: 00783875  
Patricia L. Casey  
Sr. Assistant City Attorney  
State Bar No.: 03959075  
CITY OF HOUSTON LEGAL DEPARTMENT  
900 Bagby, 4<sup>th</sup> Floor  
Houston, Texas 77002  
832.393.6462 – Telephone  
832.393.6259 – Facsimile  
[jim.corbett@houstontx.gov](mailto:jim.corbett@houstontx.gov)  
[pat.casey@houstontx.gov](mailto:pat.casey@houstontx.gov)

*Attorneys for Defendant, City of Houston*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 11, 2015, in accordance with Rule 21a of the *Texas Rules of Civil Procedure*, the foregoing document was forwarded to all attorneys of record.

**Via electronic service, facsimile and/or certified mail, rrr**

Mr. Kevin Michael Madden  
State Bar No.: 24041376  
LAW OFFICES OF KEVIN MICHAEL MADDEN, P.L.L.C.  
5225 Katy Freeway, Suite 520  
Houston, Texas 77007  
281.888.9681 – Telephone  
832.538.0937 – Facsimile  
[kmm@kmaddenlaw.com](mailto:kmm@kmaddenlaw.com)

*Attorney for Plaintiff,  
Richmond Ventures, Inc.*

/s/ James M. Corbett  
James M. Corbett

**Elaine H. Palmer**

215TH DISTRICT COURT OF TEXAS  
CIVIL COURTS BUILDING  
HOUSTON, TEXAS 77002  
(713) 368-6330

09/16/2015

TO ALL COUNSEL OF RECORD:

THE COURT HAS SET A CASE MANAGEMENT CONFERENCE FOR 8:30 A.M. ON MON 11/02/2015 regarding YOUR CAPTIONED CASE. PLEASE BE PREPARED TO PREPARE AND SUBMIT AN AGREED DOCKET CONTROL ORDER LISTING YOUR AGREED TRIAL DATE & OTHER DATES RELATING TO YOUR CASE PER JUDGE PALMER's REQUIREMENT.

\*\*AN AGREED SCHEDULING ORDER MAY BE FILED IN LIEU OF APPEARING AT THE CASE MANAGEMENT CONFERENCE. IF AGREED DOCKET CONTROL ORDER IS E-FILED, ATTORNEYS DO NOT NEED TO APPEAR OR CALL to CONFIRM. COUNSEL MAY EMAIL COORDINATOR TO INFORM THAT THE AGREED DCO HAS BEEN E-FILED. IF YOU DO NOT APPEAR AND A SCHEDULING ORDER IS NOT E-FILED THE COURT WILL SIGN AN ORDER OF DISMISSAL FOR YOUR MATTER.

IF YOU HAVE ANY QUESTIONS, YOU MAY CONTACT TRICIA ELLIS-GRIGGS at 713-368-6340.

ELAINE H PALMER  
Judge, 215TH DISTRICT COURT

CASE - 201542637 FILED - 20150723 COURT - 215th  
TYPE - OTHER CIVIL  
RICHMOND VENTURES IN VS CITY OF HOUSTON

**EXHIBIT G**



24041376

Kevin Michael Madden  
5225 Katy Fwy Ste 520  
Houston TX 77007-2292



**Elaine H. Palmer**

215TH DISTRICT COURT OF TEXAS  
CIVIL COURTS BUILDING  
HOUSTON, TEXAS 77002  
(713) 368-6330

09/16/2015

TO ALL COUNSEL OF RECORD:

THE COURT HAS SET A CASE MANAGEMENT CONFERENCE FOR 8:30 A.M. ON MON 11/02/2015 regarding YOUR CAPTIONED CASE. PLEASE BE PREPARED TO PREPARE AND SUBMIT AN AGREED DOCKET CONTROL ORDER LISTING YOUR AGREED TRIAL DATE & OTHER DATES RELATING TO YOUR CASE PER JUDGE PALMER's REQUIREMENT.

\*\*AN AGREED SCHEDULING ORDER MAY BE FILED IN LIEU OF APPEARING AT THE CASE MANAGEMENT CONFERENCE. IF AGREED DOCKET CONTROL ORDER IS E-FILED, ATTORNEYS DO NOT NEED TO APPEAR OR CALL to CONFIRM. COUNSEL MAY EMAIL COORDINATOR TO INFORM THAT THE AGREED DCO HAS BEEN E-FILED. IF YOU DO NOT APPEAR AND A SCHEDULING ORDER IS NOT E-FILED THE COURT WILL SIGN AN ORDER OF DISMISSAL FOR YOUR MATTER.

IF YOU HAVE ANY QUESTIONS, YOU MAY CONTACT TRICIA ELLIS-GRIGGS at 713-368-6340.

ELAINE H PALMER  
Judge, 215TH DISTRICT COURT

CASE - 201542637      FILED - 20150723      COURT - 215th  
TYPE - OTHER CIVIL  
RICHMOND VENTURES IN VS CITY OF HOUSTON



James Martin Corbett  
900 Bagby St Fl 4  
Houston TX 77002-2527

783875



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date. Witness my official hand and seal of office this September 17, 2015

Certified Document Number: 67064054 Total Pages: 2

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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